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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

PAUL A. REDD, JR.,

Plaintiff,

v.

STEVEN CAMBRA, JR., et al.,

Defendants.

C-98-20429 EMC

**JOINT STIPULATION AND
[PROPOSED] ORDER TO CONTINUE
TRIAL AND DISCOVERY DATES**

(Modified)

JOINT STIPULATION

1
2 1. Pursuant to Local Rule 6-2, Plaintiff Paul A. Redd, Jr. and Defendant Michael D.
3 Daley, by and through their respective counsel of record, hereby jointly stipulate and respectfully
4 request the Court enter an order as follows:

5 2. The October 20, 2014, Case Management and Pretrial Order for Jury Trial set the
6 pre-trial conference date on May 12, 2015, and trial on June 8, 2015. (ECF 234.)

7 3. On November 26, 2014, the Court granted the parties' joint stipulated request to
8 continue the discovery deadlines. (ECF 237.) In the Order, the Court set the following discovery
9 deadlines:

- 10 • Non-expert discovery cut off: February 2, 2015
- 11 • Opening expert reports: February 2, 2015
- 12 • Rebuttal expert reports: February 23, 2015
- 13 • Expert discovery cut off: March 9, 2015

14 4. Since the Court's November 26, 2014 order, the parties have continued to engage
15 in meaningful discussions regarding settlement of this action and scheduling discovery so as not
16 to prejudice their direct settlement discussions.

17 5. Defendant's counsel recently learned that their expert witness Robert Bruckman,
18 M.D., is not available for the June 8, 2015, trial due to a prior commitment. Dr. Bruckman will
19 be out of the country from May 31, 2015 to June 22, 2015. Dr. Bruckman has confirmed that he
20 would be available to attend and testify at trial the week of June 22, 2015.

21 6. Accordingly, in order for the parties to explore fully the possibility of settlement of
22 this action, allow the parties to complete discovery (including Plaintiff's taking the deposition of
23 Defendant Daley and conducting a second independent medical examination), and to allow
24 Defendant's expert to appear and testify at trial, the parties' respectfully request that the Court
25 continue the discovery, pre-trial, and trial deadlines as follows:

- 26 • Non-expert discovery cut off: March 2, 2015
- 27 • Opening expert reports: March 2, 2015
- 28 • Rebuttal expert reports: March 23, 2015

- 1 • Expert discovery cut off: April 6, 2015
- 2 • Last day to hear dispositive motions: May 7, 2015
- 3 • Pre-trial Conference: May 26, 2015
- 4 • Trial: June 22, 2015

5 Dated: January 8, 2015

Respectfully submitted,

6 RISHI N. SHARMA
7 PETER A. COOPER
8 PAUL HASTINGS LLP

9 /s/PETER A. COOPER

10 RISHI SHARMA
11 PETER A. COOPER
12 *Attorneys for Plaintiff Redd*

13 Dated: January 8, 2015

Respectfully submitted,

14 KAMALA D. HARRIS
15 Attorney General of California
16 DANIELLE F. O'BANNON
17 Supervising Deputy Attorney General

18 /s/SHARON A. GARSKE

19 TRACE O. MAIORINO
20 SHARON A. GARSKE
21 Deputy Attorney General
22 *Attorneys for Defendant Daley*

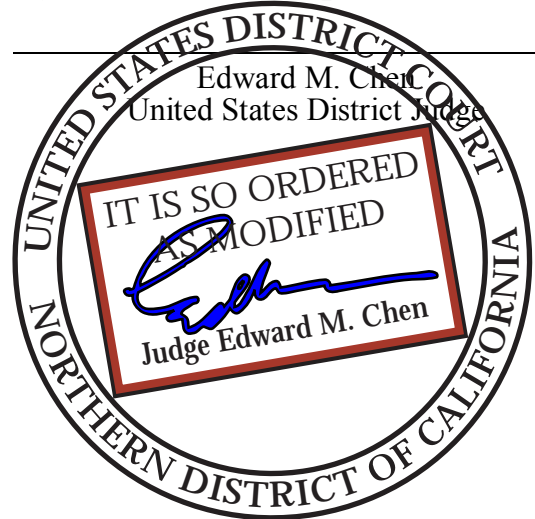
ORDER

On the stipulation of the parties, and good cause appearing therefor,

IT IS ORDERED that the discovery deadlines set in the November 26, 2014, Order (ECF 237) and the trial and pre-trial conference dates set in the October 20, 2014, Case Management and Pretrial Order for Jury Trial (ECF 234) be and hereby are continued as follows:

- Non-expert discovery cut off: March 2, 2015
 - Opening expert reports: March 2, 2015
 - Rebuttal expert reports: March 23, 2015
 - Expert discovery cut off: April 6, 2015
 - Last day to hear dispositive motions: ~~May 7, 2015~~ April 16, 2015
 - Pre-trial Conference: ~~May 26, 2015~~ May 12, 2015
 - Trial: ~~June 22, 2015~~ June 8, 2015
- Status conference to be held on 2/5/15 at 10:30 a.m. to discuss trial date. Updated joint status report due 1/29/15.

Dated: January 13, 2015



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CERTIFICATE OF SERVICE

Case Name: Redd v. Cambra, et al.

No. C-98-20429 EMC

I hereby certify that on January 8, 2015, I electronically filed the following documents with the Clerk of the Court by using the CM/ECF system:

**JOINT STIPULATION AND [PROPOSED] ORDER TO CONTINUE TRIAL AND
DISCOVERY DATES**

I certify that **all** participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

I declare under penalty of perjury under the laws of the State of California the foregoing is true and correct and that this declaration was executed on January 8, 2015, at San Francisco, California.

D. Criswell

Declarant

s/ D. Criswell

Signature